

DENNIS STEINMAN, OSB No. 954250

dsteinman@kelrun.com

SCOTT J. ALDWORTH, OSB No. 113123

saldworth@kelrun.com

ZACHARY B. WALKER, OSB No. 115461

zwalker@kelrun.com

Kell, Alterman & Runstein, L.L.P.

520 S.W. Yamhill, Suite 600

Portland, OR 97204

Telephone: 503/222-3531

Fax: 503/227-2980

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PENDLETON DIVISION

BETTY L. KNIGHT, as Personal
Representative for the **ESTATE OF**
TERRY GLEN GOODMAN,

Case No. 2:16-cv-0160-SU

Plaintiff,

v.

OREGON DEPARTMENT OF
CORRECTIONS, a state agency; **MARK**
NOOTH, individually; **JUDY GILMORE**,
individually; and **JOHN DOE 1-10**,
individually,

Defendants.

DECLARATION OF SCOTT J.
ALDWORTH IN SUPPORT OF
PLAINTIFF'S UNOPPOSED MOTION
TO EXTEND DISCOVERY
DEADLINES

I, Scott J. Aldworth, do hereby declare as follows:

Page 1 – **DECLARATION OF SCOTT J. ALDWORTH IN SUPPORT OF PLAINTIFF'S**
UNOPPOSED MOTION TO EXTEND DISCOVERY DEADLINES

KELL, ALTERMAN & RUNSTEIN, L.L.P.
ATTORNEYS AT LAW
520 S.W. YAMHILL, SUITE 600
PORTLAND, OR 97204
TELEPHONE: (503) 222/3531
FACSIMILE (503) 227-1980

1. I am one of the attorneys for Plaintiff in this case. I have prepared this declaration in support of Plaintiff's Unopposed Motion to Extend Discovery Deadlines.

2. On May 10, 2015, the Court entered an Order Granting Plaintiff's Unopposed Motion for Extension of Discovery & PTO Deadlines [#11]. The parties are actively pursuing settlement discussions and request that the Court extend the current deadlines for 90 days, beginning with the deadline for fact discovery and joinder of claims or parties, currently set for December 1, 2016.

3. This Motion is presented in good faith and not for reasons of delay.

I HEREBY DECLARE THAT THE ABOVE STATEMENTS ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

Dated this 7th day of September, 2016.

s/Scott J. Aldworth
Scott J. Aldworth, OSB No. 113123

Page 2 – DECLARATION OF SCOTT J. ALDWORTH IN SUPPORT OF PLAINTIFF'S UNOPPOSED MOTION TO EXTEND DISCOVERY DEADLINES

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